## Case 1:18-cr-00693-RMB Document 147 Filed 12/05/19 Page 1 of 1



Hogan Lovells US LLP 390 Madison Avenue New York, NY 10017 T +1 212 918 3000 F +1 212 918 3100 www.hoganlovells.com

December 5, 2019

## **VIA ECF**

Honorable Richard M. Berman United States District Judge Southern District of New York United States Courthouse 500 Pearl Street New York, NY 10007-1312

Re: United States v. Ramses Owens, et al., 18 CR. 693 (RMB)

Dear Judge Berman:

We represent Richard Gaffey in the above-referenced matter. On behalf of both Mr. Gaffey and his co-defendant, Johan von der Goltz, we are writing to respectfully request a one-week adjournment of the date on which the joint jury charge and voir dire must be filed. The jury charge is currently scheduled to be filed on Monday, December 9, 2019. We are therefore respectfully requesting an adjournment until Monday, December 16, 2019. This is the defendants' first request for such an adjournment. We have conferred with the government, which has consented to this request.

The charges in this case are complex, including allegations of a long-term tax evasion conspiracy involving a number of complicated legal issues. The jury charge that the defense recently received from the government was 80 pages long, with nearly 50 separate jury instructions. With in limine motions also due to be filed on December 9, the defense will need additional time to review the charge provided by the government and to then confer with the government concerning the position of the defendants. This adjournment will not impact the schedule for trial, which is scheduled to begin on January 13, 2020.

Accordingly, the defendants respectfully request that the date on which the jury charge and voir dire must be submitted is adjourned to December 16, 2019.

Respectfully submitted,

Robert B. Buehler Tel.: 212 918 3261

robert.buehler@hoganlovells.com

cc: Counsel of Record

Hogan Lovells US LLP is a limited liability partnership registered in the District of Columbia. "Hogan Lovells" is an international legal practice that includes Hogan Lovells US LLP and Hogan Lovells International LLP, with offices in: Alicante Amsterdam Baltimore Beijing Brussels Caracas Colorado Springs Denver Dubai Dusseldorf Frankfurt Hamburg Hanoi Ho Chi Minh City Hong Kong Houston Johannesburg London Los Angeles Luxembourg Madrid Mexico City Miami Milan Monterrey Moscow Munich New York Northern Virginia Paris Perth Philadelphia Rio de Janeiro Rome San Francisco São Paulo Shanghai Silicon Valley Singapore Sydney Tokyo Ulaanbaatar Warsaw Washington DC Associated offices: Budapest Jakarta Jeddah Riyadh Zagreb. For more information see www.hoganlovells.com